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7

8 UNITED STATES BANKRUPTCY COURT  
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA

10 In re  
11 THE LITIGATION PRACTICE GROUP P.C.,  
12 Debtor.  
13  
14  
15  
16  
17

Case No. 8:23-bk-10571-SC

Chapter 11

TRUSTEE’S OMNIBUS MOTION FOR  
ORDER THAT (1) INITIAL HEARINGS  
BE STATUS CONFERENCES; AND  
(2) TO CONTINUE HEARINGS ON  
MERITS OF MOTIONS FOR  
ALLOWANCE OF ADMINISTRATIVE  
EXPENSE CLAIM UNDER 11 U.S.C.  
§503(B); MEMORANDUM OF POINTS  
AND AUTHORITIES; DECLARATION OF  
D. EDWARD HAYS

[LBR 9013-1(m)]

Current Hearing Date  
Date: January 19, 2024  
Time: 11:00 a.m.  
Ctrm: 5C - V ViaZoom<sup>1</sup>

21  
22 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY COURT  
23 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED  
24 PARTIES:

25 Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) for the bankruptcy  
26 estate (“Estate”) of The Litigation Practice Group P.C. (“LPG / Debtor”), moves the Court to enter  
27 an order that the initial hearings on the two dozen motions for allowance of administrative claims be  
28

<sup>1</sup> Check Judge Clarkson’s tentative prior to hearing for further Zoom instructions.

limited to status conferences and to continue the hearings on the merits to dates to be set at the status conferences as follows:

**1. Motions with scheduled hearing date of January 19, 2024.**

Docket No.	Date Filed	Claimant
645; 647	11/8/23	Judith Skiba
665	11/15/2023	ADP
671	11/16/23	United Partnerships
674	11/17/23	Han Trinh
675	11/17/23	Phuong (aka Jayde) Trinh
676	11/17/23	Greyson Law Center, PC
679	11/20/23	Wells Marble and Hurst, PLLC
686	11/20/23	SDCO Tustin Executive Center, Inc.
697	11/21/23	David Orr, Esq.
702	11/21/23	Peter Schneider
706	11/21/23	Amy Ginsburg, Kenton Cobb and Shannon Bellfield
707	11/21/23	Randall Baldwin Clark, Attorney at Law, PLLC
708	11/21/23	Herret Credit Consultants
729	11/28/23	Sharp Electronics Corporation
750	12/6/23	Alteryx

collectively, the “Scheduled Admin Claim Motions.”

**2. Motions with no hearing date**

Docket No.	Date Filed	Claimant
693	11/20/23	Melina Beltran
694	11/20/23	Kimberly Torres
695, amended by 727	11/20/23 (695)  11/28/23 (727)	Melissa Wilkes

1	698	11/21/23	R. Reed Pruyn
2	700	11/21/23	Jorge E. Sanchez
3	701	11/21/23	Jaslynn Sanchez
4	UNFILED as an admin claim, but Claim 95-1 in the claims register appears to be a likely admin claim	6/30/23 in the claims register as Claim 95-1	Olga Esquivel
5			
6			
7	UNFILED as an admin claim, but Claim 87-1 in the claims register appears to be a likely admin claim	6/22/23 in the claims register as Claim 87-1	Edwin Fitz
8			
9			
10			
11			
12	UNFILED as an admin claim, but Claim 2180 in the claims register appears to be a likely admin claim	12/4/23	Brianne Puszai
13			
14			
15			
16			

collectively, the “Unscheduled Admin Claim Motions,” and with the Scheduled Admin Claim Motions, referred to as the “**Admin Claim Motions.**”

### **3. Summary of Argument**

Given that there are two dozen parties that have filed or sought allowance of administrative claims, Trustee believes that the most efficient way towards resolution of the various contested matters is to order that the initial hearings be limited to status conferences. During the conferences, the Court can assess the amount of time the parties need to conduct discovery and to have the matters set for hearings on the merits. A continuance will also permit Trustee and the Committee to investigate and verify the nature of each Admin Claim and to meet and confer with claimants to determine if consensual resolutions are possible.

**4. Pertinent Factual Background**

**A. Debtor's Business, Bankruptcy Filing, and Appointment of a Trustee**

Pre-petition, Debtor was a law firm that provided consumer debt resolution services and creditor litigation services to clients, servicing more than 50,000 customers across the United States. In 2022, Debtor's annual revenue exceeded \$150 million.

On March 20, 2023, Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States Bankruptcy Court for the Central District of California, Santa Ana Division ("Bankruptcy Case"). Prior to bankruptcy, Debtor fraudulently transferred substantially all its assets and clients. As of the petition date, Debtor had virtually no assets or clients.

On March 30, 2023, as Dk. No. 21, the Office of the United States Trustee ("UST") filed a motion to dismiss or convert the Bankruptcy Case under 11 U.S.C. § 1112(b) for failure to comply with its guidelines and requirements for a chapter 11 case. No opposition to the motion was filed.

On May 3, 2023, a hearing was held on the motion to dismiss or convert. At the hearing, the Court directed the UST to appoint a Chapter 11 Trustee. Richard A. Marshack was appointed the Chapter 11 trustee of the Debtor's Estate. *See*, Dk. No. 65.

Upon his appointment, Trustee filed litigation seeking, among other things, to avoid and recover Debtor's fraudulent transfers of its assets and client base. *See*, Adv. Case No. 8:23-ap-01046-SC. On June 27, 2023, Trustee filed a stipulation with Defendant, Phoenix Law Group, Inc., avoiding, recovering, and preserving the legal service agreements between Debtor and its clients.

On July 22, 2023, as Dk. No. 320, the Court granted Trustee's sale motion of such contracts, as reformed, and entered an order approving the sale of estate assets. Pursuant to the Sale Order, the buyer closed on August 4, 2023. Trustee is in receipt of approximately \$5.1 million of sales proceeds ("Sales Proceeds"). Further Sale Proceeds will be received in the future beginning in Q1 2024.

On October 13, 2023, as Dk. No. 575, Trustee, the Office of the United States Trustee, and the Official Committee of Unsecured Creditors entered into a Stipulation to Set Administrative Bar Date ("Bar Date Stipulation").

On October 16, 2023, as Dk. No. 577, the Court entered an order approving the Bar Date Stipulation (“Bar Date Order”) and setting November 21, 2023, as the deadline for filing of any motion to obtain an allowed administrative claim arising at any time from the March 20, 2023, petition date, through and including the sale closing date of August 4, 2023 (“Non-Professional Administrative Claims Bar Date”).

On October 23, 2023, as Dk. No. 596, the Trustee filed the First Notice of Administrative Claims Bar Date (“Bar Date Notice”).

To date, two dozen claimants have filed motions or sought allowance of administrative claims. Given the volume of the pending motions, Trustee believes that the most efficient path forward is to treat the initial hearings as status conferences and to then schedule further hearings to resolve the merits of the various motions.

## **5. Legal Argument**

### **A. Good cause exists to order that the initial hearings be limited to status conferences with future hearings to be scheduled to resolve the merits of the various motions.**

A court has the inherent authority to control its calendar and the disposition of its cases with economy of time and effort for both the court and the parties. *Esparza v. Lizarraga*, 2019 U.S. Dist. LEXIS 188452, at \*11-12 (C.D. Cal. Aug. 7, 2019). In the U.S. Bankruptcy Court for the Central District of California, a motion for continuance must: (1) state the detailed reasons for the continuance; (2) state whether any prior continuance has been granted; (3) be accompanied by a declaration of a competent witness attesting to the necessity for the continuance; and (4) be accompanied by a proposed order - which has been lodged - in accordance with LBR 9021-1(b). See LBR 9013-1(m)(A)-(B).

Trustee requests that Court continue all the hearings on the merits and treat the existing January 19, 2024, hearings as status conferences. Trustee is in the process of finishing his review of the two dozen motions, deciding what discovery is necessary, and to reach out to the various claimants to meet and confer and determine whether consensual resolutions can be reached on some

1 or all of the issues raised in each motion. Some of the requests for administrative expenses were not  
2 filed as motions but instead were filed as proofs of claim.

3 Because the claims register has already reached 2,332 claims as of the filing of this  
4 Omnibus Motion, a continuance is necessary to assure that all §503 claims are properly collated for  
5 response on the merits. Moreover, there appears to be significant overlap in several of the Admin  
6 Claim Motions regarding the amount claimed for post-petition legal services provided to the  
7 consumers.

8 Trustee requests time to meet and confer with these claimants to investigate and verify that  
9 there is no double accounting; e.g., a claimant like Greyson Law Center, PC., is asserting a claim  
10 for work done by attorneys who worked with Greyson but who are apparently filing claims on their  
11 own behalf. Likewise, several post-petition wage claims do not identify their alleged employer (i.e.  
12 LPG or Phoenix or Maverick) or the basis for calculating claimed wages.

13 Trustee requests that the Court continue the hearings on the merits for approximately 60  
14 days. A proposed order limiting the initial hearings to status conferences is being lodged with the  
15 Court contemporaneously with the filing of this motion. Hays Declaration.

16 **B. Procedural Requirements Under the Local Rules.**

17 “Unless otherwise ordered, a motion for the continuance of a hearing under this rule must be  
18 filed as a separately captioned motion, and must be filed with the court and served upon all  
19 previously noticed parties by facsimile, email, personal service, or overnight mail at least 3 days  
20 before the date set for the hearing.” LBR 9013-1(m). Further, the local rules provide that a motion  
21 for continuance must “state whether any prior continuance has been granted.” LBR 9013-  
22 1(m)(1)(A).

23 This motion requesting continuance of the hearing on the Admin Claim Motions has been  
24 filed 14 days prior to the hearing on the Admin Claim Motions. As such, it is timely. This motion  
25 is also being served on all the parties who filed or are seeking administrative claims.

1 **6. Conclusion**

2 For the reasons set forth above, Trustee requests that the Court limit the existing hearings to  
3 be status conferences. During the conferences, the Court can schedule further hearings on the merits  
4 after hearing from all parties.

5  
6 DATED: January 5, 2024

MARSHACK HAYS WOOD LLP

7  
8 By: /s/ D. Edward Hays  
9 D. EDWARD HAYS  
Attorneys for Chapter 11 Trustee,  
RICHARD A. MARSHACK

**Declaration of D. Edward Hays**

I, D. EDWARD HAYS, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
3. The facts set forth below are true of my personal knowledge.
4. All terms not otherwise defined herein are used as they are defined in the motion for continuance to which this declaration is appended.
5. I am an attorney at law licensed to practice before all courts in California and this Court.
6. I am a partner in the law firm of Marshack Hays Wood LLP, counsel of record for Richard A. Marshack, in his capacity as Chapter 11 Trustee ("Trustee") for the bankruptcy estate ("Estate") of The Litigation Practice Group P.C. ("Debtor").
7. I make this Declaration in support of the motion for a continuance ("Motion") of the hearings scheduled for January 19, 2024, at 11:00 a.m., and to set hearings on calendar related to the motions for allowance of administrative expense claim under 11 U.S.C. §503(b) filed by multiple parties, pursuant to Local Bankruptcy Rule 9013-1(m)(1)(A).
8. On October 13, 2023, as Dk. No. 575, Trustee, the Office of the United States Trustee, and the Official Committee of Unsecured Creditors entered into a Stipulation to Set Administrative Bar Date ("Bar Date Stipulation").
9. On October 16, 2023, as Dk. No. 577, the Court entered an order approving the Bar Date Stipulation ("Bar Date Order") and setting November 21, 2023, as the deadline for filing of any motion to obtain an allowed administrative claim arising at any time from the March 20, 2023, petition date, through and including August 4, 2023 ("Non-Professional Administrative Claims Bar Date").
10. On October 23, 2023, as Dk. No. 596, Trustee filed and served the First Notice of Administrative Claims Bar Date ("Bar Date Notice").



11. The following motions were filed with a hearing date of January 14, 2024:

Docket No.	Date Filed	Claimant
645; 647	11/8/23	Judith Skiba
665	11/15/2023	ADP
671	11/16/23	United Partnerships
674	11/17/23	Han Trinh
675	11/17/23	Phuong (aka Jayde) Trinh
676	11/17/23	Greyson Law Center, PC
679	11/20/23	Wells Marble and Hurst, PLLC
686	11/20/23	SDCO Tustin Executive Center, Inc.
697	11/21/23	David Orr, Esq.
702	11/21/23	Peter Schneider
706	11/21/23	Amy Ginsburg, Kenton Cobb and Shannon Bellfield
707	11/21/23	Randall Baldwin Clark, Attorney at Law, PLLC
708	11/21/23	Herret Credit Consultants
729	11/28/23	Sharp Electronics Corporation
750	12/6/23	Alteryx

collectively, the “Scheduled Admin Claim Motions.”

12. The following motions were filed with no hearing date:

Docket No.	Date Filed	Claimant
693	11/20/23	Melina Beltran
694	11/20/23	Kimberly Torres
695, amended by 727	11/20/23 (695)  11/28/23 (727)	Melissa Wilkes
698	11/21/23	R. Reed Pruyn
700	11/21/23	Jorge E. Sanchez
701	11/21/23	Jaslynn Sanchez

1	UNFILED		FTL 500 Corp.
2			Larry Glick is the FTL 500 attorney (sometimes docket only
3			has his name)
4	UNFILED;		Russell Squires
5	Doc 412 is an		
6	order <i>allowing</i> an		
7	admin. claim		
8	UNFILED;		River Tree, LLC
9	Doc 522 is an		
10	order <i>allowing</i> an		
11	admin. claim		
12	Claim 95-1	6/30/23 in	Olga Esquivel
13	UNFILED	the claims	
14	UNFILED	register	
15	UNFILED		Edwin Fitz
16	UNFILED		Brianne (?)

collectively, the “Unscheduled Admin Claim Motions”, and with the Scheduled Admin Claim Motions, referred to herein as “**Admin Claim Motions.**”

13. This motion is being filed 14 days prior to the hearing on the Admin Claim Motions. As such, it is timely.

14. This motion is being served on all the parties who have filed or are seeking allowance of administrative claims.

15. A proposed order limiting the initial hearings to be status conferences and to continue the hearings on the merits of the various requests is being lodged with the Court contemporaneously with the filing of this motion.

16. Prior to the filing of this Motion, I spoke with counsel for the Official Committee of Unsecured Creditors and it is in agreement with Trustee’s request to limit the initial hearings to status conferences.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 5, 2024.

/s/ D. Edward Hays

D. EDWARD HAYS

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **TRUSTEE'S OMNIBUS MOTION FOR ORDER THAT (1) INITIAL HEARINGS BE STATUS CONFERENCES; AND (2) TO CONTINUE HEARINGS ON MERITS OF MOTIONS FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM UNDER 11 U.S.C. §503(B); MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF D. EDWARD HAYS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **D January 5, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **January 5, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.

17542 17TH ST, SUITE 100

TUSTIN, CA 92780-1984

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on   , I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 5, 2024

Date

Layla Buchanan

Printed Name

/s/ Layla Buchanan

Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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- **INTERESTED PARTY COURTESY NEF:** Victoria Newmark vnewmark@pszjlaw.com
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- **ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS:** Keith C Owens kowens@foxrothschild.com,  
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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